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# ***Partnering to Facilitate Site Closeouts and Avoid Unnecessary Investigations***

***Presented by Joseph Rail  
Remedial Project Manager Indian Head  
NAVFAC Washington***

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# Presentation Overview



**Partnering Team**  
**Desktop Evaluation Process**  
**Site Examples**  
**Successes/Lessons Learned**

# Team Members



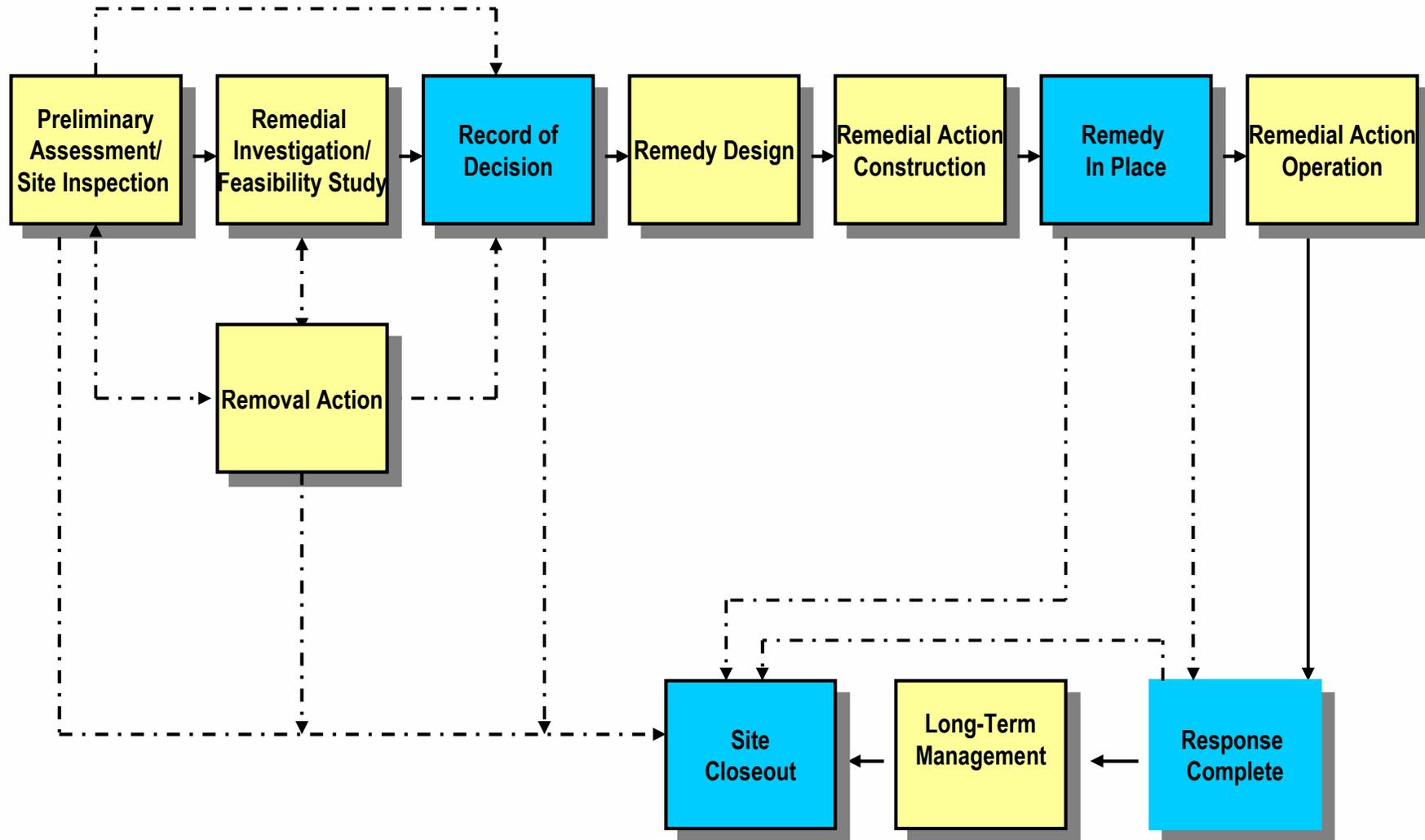
**NAVFAC Washington**  
**Naval Support Facility - Indian Head**  
**U.S. Environmental Protection Agency**  
**Maryland Department of Environment**  
**NAVY CLEAN contractors**

# Federal Facility Agreement (FFA)



- **FFA pulled in 65 CERCLA/RCRA sites & 28 Areas of Concern**
- **FFA involves strict procedures**
  - Emphasis on written communication (certified mail)
  - Deadlines
  - Legal process
  - Roles & responsibilities

# Typical CERCLA Process



# Team Mission Statement



“The mission of the Indian Head Installation Restoration Team (IHIRT) is to strive in a spirit of teamwork and cooperation, to reduce environmental risks as effectively as possible. To this end, we will apply our combined skills and resources to making clean-up decisions that meet the requirements of the Navy, the EPA, and the State of Maryland, address the needs of the community, are cost effective, and are based on sound scientific principles. Completion of this mission will result in the Installation qualifying for removal from the National Priority List.”

# Team Vision Statement



“To reach Response Complete for all sites at Naval Support Facility-Indian Head as soon as possible and as economically as possible without exceeding the final estimated cost at completion.”

# Team Vision Accomplishments



- **Responsible Partnering**

- Maintaining open communication throughout a project
- Quickly reaching consensus on issues that arise
- Listening to others' ideas

- **Technology Selection**

- Finding and using innovative technologies
- Choosing effective technologies that eliminate future actions
- Choosing efficient technologies that reduce costs of cleanups

# Team Member Support



- **DoD** - enhances the effectiveness and efficiency of the cleanup process
- **Regulators** - their concerns are addressed by the Team and are reflected in cleanup decisions
- **Contractors** - enables them to contribute to the decision-making process
- **The community** - their voice is being heard and reflected in the Team's decisions

# Partnering



- **Facilitates/speeds up communication**
  - Regular team meetings
  - Cooperative environment
  - Phone calls
  - Conference calls
  - Email
- **IR work is full of surprises**
  - Open communication helps deal with them in timely, effective manner, w/regulatory concurrence

# Partnering Process



- **Decisions are made by consensus**
- **Maintain open and honest communication**
- **Support each agency's mission**
- **Conflict does not stop the process**
- **Ongoing facilitation is key to success**

# Partnering Levels



## Tier III Executive Management Team

Regional Guidance  
Issue Resolution



Region-Wide Issues  
Region-Wide Policy

## Tier II Management Team

Resource and Support  
Issue Resolution



State-Specific Issues  
Police and Guidance

## Tier I Project Team

Oversight  
Metrics

Complete Cleanup  
Identify Issues For Tier II

# Team Meeting Basics



- **Follow ground rules**
- **Follow a structured agenda**
- **Use project tracking spreadsheets**
- **Compile a plan to meet goals**

# Benefits of Partnering



- **On-board reviews**
- **“Desk-top” evaluations**
- **Site Screening Process (focused sampling)  
Investigations**
- **Brief Decision Documents**

# Successes - Desk-Top Evaluations (DTE)



## 28 Areas of Concern (AOCs)

- FFA included deadlines, specific review periods
- DTEs would be accomplished 1<sup>st</sup> by Navy, then submitted, in writing, to EPA
- EPA would review & respond, in writing
- IHIRT met in conference room and reviewed all information together – as a team
- Reached consensus on most AOCs in one day
- Some further research for others
- Result: 16 NFA; 12 further evaluation

# DTE Example



## **SWMUs 4 & 5 – Underground Storage Tanks**

- 500-gal & 1000-gal waste oil tanks
- DTE determined that Navy had removed tanks & the contaminated soil
- MDE had provided close-out letters
- IHIRT reached concurrence for NFA

# Successes - Site-Screening Process Investigations (SSP)



- FFA identified 37 Site-Screening Areas (SSAs)
- Again, FFA process involved deadlines, written communication, specific review periods
- IHIRT conducted SSP investigations; agreed-upon work plans, focused sampling
- NFA Decision Documents for 13 sites w/cost avoidance around \$11M

# Site 40 Palladium Catalyst in Sediment



# Site 40 Palladium Catalyst in Sediment



- Listed in the FFA (2000) as requiring a RI
- Reassigned as a SSA in 2004 and Desk-top Evaluation started
- Reviewed existing documents
- Sediment samples analyzed for palladium
- NFA Decision Document signed on 4/29/04

# IHIRT Successes - IRA



- EPA & DoD disagreement about Institutional Controls held up Records of Decision (RoDs)
- IHIRT had two RoDs for remedial actions ready for signature
- No RoDs signed until conflict resolved
- IHIRT decided to address “engineering” aspect of remedies using Interim Removal Actions (IRAs)

# IRA Example, Site 12 – Town Gut Landfill



# IRA Example



## Site 12 – Town Gut Landfill

- Remedy called for soil cover, groundwater monitoring, and land-use controls
- Could not get RoD signed
- IHIRT agreed to conduct IRA
- Prepared Action Memorandum
- Accomplished physical portion of remedy
- After EPA & DoD resolved differences, RoD signed (post-IRA conditions)

# Overall Project Successes



- Navy benefits from a reduction in expense on unnecessary investigation
- Fewer site restrictions
- Satisfied regulators
- Community is satisfied that site conditions are protective and progress is being made
- Results demonstrate that partnering does work

# Lessons Learned



- Partnering with regulators saves time and accomplishes work faster
- The routine and formal CERCLA process can take a lot of time to see success
- Evaluate existing information before committing to RI/FS, RA, etc. and the subsequent requirement for a ROD

# Partnering Presentation



**Questions?**